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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

INDUSTRIENS  
PENSIONSORSIKRING A/S,  
Individually and On Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

BECTON, DICKINSON AND  
COMPANY and THOMAS E.  
POLEN,

Defendants.

Case No. 2:20-cv-02155-SRC-CLW

Hon. Stanley R. Chesler  
District Court Judge

Hon. Cathy L. Waldor  
Magistrate Judge

**NOTICE OF CLASS REPRESENTATIVE'S UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF SETTLEMENT AND AUTHORIZATION  
TO DISSEMINATE NOTICE OF SETTLEMENT**

**TO: ALL PARTIES AND THEIR COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that Court-appointed Class Representative Industriens Pensionsforsikring A/S, by and through its undersigned counsel, respectfully moves this Court, pursuant to Rule 23(e)(1) of the Federal Rules of Civil Procedure, for entry of the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice (“Preliminary Approval Order”) that will, among other things: (i) preliminarily approve the proposed settlement of the above-captioned action; (ii) approve the form and manner of giving notice of the proposed settlement to Class Members; and (iii) schedule a hearing to consider final approval of the proposed settlement, approval of the proposed plan of allocation, and approval of Class Counsel’s motion for an award of attorneys’ fees and expenses.

**PLEASE TAKE FURTHER NOTICE** that, in support of the Motion, the undersigned intend to rely on the accompanying Memorandum of Law.

**PLEASE TAKE FURTHER NOTICE** that the parties’ Stipulation and Agreement of Settlement dated December 19, 2023 and its exhibits (collectively, the “Stipulation”) and the parties’ agreed-upon proposed Preliminary Approval Order and its exhibits are attached.

**PLEASE TAKE FURTHER NOTICE** that, in accordance with the terms of the Stipulation, Defendants will not oppose this Motion. Class Representative respectfully submits that the Motion is ripe for consideration by the Court.

Dated: December 21, 2023

Respectfully submitted,

s/ James E. Cecchi

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